## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

DONALD EDWARDS, Plaintiff,	) ) )	No: 06 C 3110
	)	
VS.	)	Judge Lefkow
	)	Judge Coar, Presided over trial
OFFICERS ROGOWSKI, NEGRON,	)	,
SHANKLE, AND THE VILLAGE OF	)	Magistrate Judge Brown
MELROSE PARK,	)	Jury Demand
Defendants.	)	•

## **PLAINTIFF EDWARDS' MOTION FOR FEES**

NOW COMES Plaintiff Donald Edwards, by and though his counsels Angela Lockett, Standish E. Willis, Teniece Harris and Brendan Shiller, and moves this court pursuant to 42 U.S.C. § 1988, and Federal Rule of Civil Procedure 54(d)(2)(B) for costs and attorneys' fees, and in support of said motion states as follows:

- 1. On February 28, 2008, a federal jury sitting in the Northern District of Illinois found for Donald Edwards in his 42 U.S.C. § 1983 claims against Officer Shankle and Lt. Rogowski; specifically the court found that Officer Shankle falsely arrested Donald Edwards in violation of 42 U.S.C. § 1983; and that Lt. Rogowski falsely arrested and used excessive force 42 U.S.C. § 1983. Judgment on the case was entered on March 5, 2008.
- Under 42 U.S.C. § 1988, the prevailing party in a § 1983 suit may obtain reasonable attorneys' fees and costs as determined by the court. *Gaytan v. Kapus*, 181 F.R.D. 573 (N.D. Ill 1998).
- 3. Movant has attached the following to his motion for fees:
  - a. Joint statement pursuant to Local Rule 54.3;

- b. Plaintiff's memorandum of law in support of attorney's fees, with supporting affidavits.
- c. Plaintiff's submitted hours.
- d. Defendant's itemized objections to Plaintiff's hours.
- e. Defendant's submission to Plaintiffs of May 9, 2008.
- f. Defendant's memorandum of law in opposition to attorney's fees with supporting affidavits.

Respectfully submitted,

The Law Office of Standish E. Willis

By: s//Angela Lockett
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